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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MASOUMEH MOTEVALLI
ALAMOUTI, individually and as
successor-in-interest to Masoud
Rahmati, deceased; and MOSHEN
RAHMATI, individually,

Plaintiffs,

v.

COUNTY OF LOS ANGELES;
YVONNE PULLEN; RYAN GARCIA;
BRISEIDA NOCHEZ; RENE
AGUILAR ORNELAS; JOEL LEYVA;
ANDREW WISE; JASON
GONZALEZ; BART MARSHALL;
MICHAEL MAYBEE; and
OLUWASANMI OGUNJUMO,

Defendants.

Case No. 2:24-cv-05560-MWC-JC

Hon. Michelle Williams Court

**JOINT STATUS REPORT RE:
SETTLEMENT AND ORDER TO
SHOW CAUSE RE DISMISSAL [54]**

Hearing Date: Dec. 19, 2025

Hearing Time: 1:30 p.m.

Courtroom: 6A

1 **TO THE HONORABLE COURT:**

2 Plaintiffs, Masoumeh Motevalli Alamouti and Moshen Rahmati; and
3 Defendants, County of Los Angeles, Yvonne Pullen, Ryan Garcia, Briseida Nochez,
4 Rene Aguilar Ornelas, Joel Leyva, Andrew Wise, Jason Gonzalez, Bart Marshall,
5 Michael Maybee, and Oluwasanmi Ogunjumo—the parties to this action—by and
6 through their respective attorneys of record, hereby submit the following joint status
7 report regarding the status of the pending conditional settlement of this matter,
8 ahead of the upcoming Order to Show Cause hearing set by the Court.

9 WHEREAS, in the summer of 2025, the parties participated in a mediation
10 with ADR Panel Mediator Richard Copeland, during which the parties reached a
11 conditional settlement to resolve this entire case in its entirety.

12 WHEREAS, on September 19, 2025, the parties filed a Notice of Conditional
13 Settlement and Request to Vacate All Dates to advise the Court that the parties had
14 reached a conditional settlement of the entire action, and that such settlement was
15 subject to the review and approval of entities within and for the County of Los
16 Angeles, including its Board of Supervisors. [Dkt. 53] The Notice also advised that,
17 because of the nature of the County’s processes for review and approval of
18 settlements, such review and approval was expected to be completed within twelve
19 months of the filing of the Notice. [*Id.*]

20 WHEREAS, on September 22, 2025, the Court issued an Order Setting Order
21 to Show Cause re Dismissal, with a hearing set for December 19, 2025, at 1:30 p.m.
22 [Dkt. 54.] That Order also provided that if the parties filed a dismissal by December
23 5, 2025, the hearing would be taken off calendar. [*Id.*] It also provided that “[a]ll
24 dates and deadlines remain as previously scheduled.” [*Id.*]

25 WHEREAS, Defendant County of Los Angeles, by and through its counsel of
26 record, here provides the following update regarding the status of its review and
27 consideration of the proposed settlement of this action: The Sheriff’s Department is
28 still in the process of completing a Corrective Action Plan, a prerequisite for

1 obtaining claims board approval. Due to the amount of pending settlements and the
2 available staff, the County expects the claims approval process to be completed by
3 September 2026 or earlier.

4 WHEREAS, since the parties' Notice was filed and the Court's Order was
5 issued, the following deadlines set by the Court in this action have passed: Expert
6 Discovery Cutoff (Sept. 26, 2025), Last Day to Hear Motions (November 14, 2025),
7 Deadline to Complete Mediation (November 28, 2025). [Dkt. 20, 54.] The following
8 dates and deadlines set by the Court in this action remain in the coming months:
9 Trial Filings (First Round) (January 9, 2026), Trial Filings (Second Round) (January
10 23, 2026), Final Pretrial Conference (February 6, 2026, 1:30 p.m.), Jury Trial
11 (February 23, 2026, 8:30 a.m.). [*Id.*]

12 WHEREAS, given the continued pendency of the County of Los Angeles's
13 review and consideration of the proposed settlement of this entire action, and in light
14 of this Notice, the parties respectfully request that the December 19, 2025 Order to
15 Show Cause hearing be continued to a date in September 2026 or other date the
16 Court deems appropriate, and that all other remaining dates and deadlines in this
17 action be vacated.

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1 WHEREAS, based on the above, good cause exists for granting the foregoing
2 requests.

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4 Respectfully submitted,

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6 DATED: December 8, 2025

LAW OFFICES OF DALE K. GALIPO
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9 By: /s/ Benjamin S. Levine
Dale K. Galipo
Benjamin S. Levine¹
Attorneys for Plaintiffs

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12 DATED: December 8, 2025

COLLINS + COLLINS LLP

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14 By: /s/ Chandler A. Parker
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28 ¹ Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other
signatories listed, and on whose behalf the filing is submitted, concur in the filing's
content and have authorized the filing.